

**IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

IN RE RICHARD M. OSBORNE, SR.  
*Debtor*

CASE No. 17-17361  
JUDGE ARTHUR I. HARRIS  
CHAPTER 7

**RESPONSE OF DEBTOR RICHARD M. OSBORNE, SR. TO MOTIONS OF UNITED STATES TRUSTEE  
AND FRIST NATIONAL BANK OF PENNSYLVANIA FOR EXTENSIONS OF TIME TO FILE  
COMPLAINTS OBJECTING TO DISCHARGE**

Richard M. Osborne, Sr., the debtor (“Debtor”), responds to the Motion of the United States Trustee for an Order Granting an Extension of Time to File a Complaint Objecting to Discharge [Doc. 613] (“UST Motion”) and First National Bank of Pennsylvania’s Motion to Extend the Time to File a Complaint Objecting to Discharge [Doc. 624] (“FNB Motion” and with the UST Motion collectively the “Motions”).

Both of the Motions reference an agreed order extending the time for the Chapter 7 trustee to file a complaint objecting to the debtor’s discharge. [Doc. 599]. However, the motion filed by the Chapter 7 trustee for extension of time was premised in part on the fact that the Chapter 7 trustee had only recently been appointed in the case and needed considerably more information and time to make a determination as to whether not such a complaint was warranted.

By contrast, both the UST and FNB have been involved in this case since the beginning, and FNB’s involvement with the Debtor goes back several years. The Debtor has testified it several 341 meetings and several depositions during that time. There is therefore no particular justification for the further extension of time for FNB or UST to file a complaint objecting to the Debtor’s discharge.

UST Motion seeks only an extension of time to January 15, 2020 which is the same extension which is granted to the Chapter 7 trustee. However the FNB Motion seeks to extend the period through April 15, 2020 which is far too long especially given FNB’s familiarity with this case.

The Debtor has no objection if the Court wants to extend the time for these two parties to object to the Debtor's discharge to the same deadline given to the Chapter 7 trustee, January 15, 2020.

Therefore Richard M. Osborne, Sr., the debtor respectfully requests that this Court enter an order only extending the deadline for FNB and the UST to object to these discharge to January 15, 2020.

Respectfully submitted,  
/s/ Frederic P. Schwieg, Esq.

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A copy of this Response was served on the following on the date filed by Notice of Electronic Filing.

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